

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :

- v. - : INDICTMENT

MILETA MILJANIC, : 22 Cr. 318

Defendant. :

- - - - - x

COUNT ONE
(Wire Fraud)

The Grand Jury charges:

1. From at least in or about March 2020, up to at least in or about May 2020, in the Southern District of New York and elsewhere, MILETA MILJANIC, the defendant, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, would and did transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, in violation of Title 18, United States Code, Section 1343, to wit, MILJANIC engaged in a scheme to obtain funds from the Small Business Administration ("SBA") through the SBA's Economic Injury Disaster Loan ("EIDL") Program, by means of false and fraudulent pretenses, representations, and documents, including through electronic

communications transmitted into and out of the Southern District of New York.

(Title 18, United States Code, Sections 1343 and 2.)

COUNT TWO
(False Statements to the SBA)

The Grand Jury further charges:

2. From in or about March 2020, up to at least in or about May 2020, in the Southern District of New York and elsewhere, MILETA MILJANIC, the defendant, knowingly and willfully made a false statement, knowing such statement to be false, for the purpose of obtaining a loan, extension thereof by renewal, deferment of action and otherwise, and the acceptance, release and substitution of security therefor, for himself, and for the purpose of influencing in any way the action of the SBA, and for the purpose of obtaining money, property, or anything of value, under Chapter 14 of Title 15 of the United States Code, to wit, MILJANIC made false and misleading statements to the SBA regarding, among other things, gross revenues and expenses during the 12 months prior to the COVID-19 pandemic, for the purpose of obtaining funds through the EIDL Program administered by the SBA.

(Title 15, United States Code, Section 645(a) and Title 18, United States Code, Section 2.)

FORFEITURE ALLEGATION

3. As a result of committing the offense alleged in Count One of this Indictment, MILETA MILJANIC, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28 United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

Substitute Assets Provision

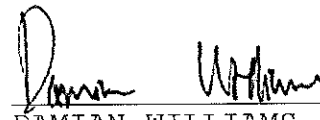
4. If any of the above described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 981,
Title 21, United States Code, Section 853, and
Title 28, United States Code, Section 2461.)


FOREPERSON


DAMIAN WILLIAMS
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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INDICTMENT

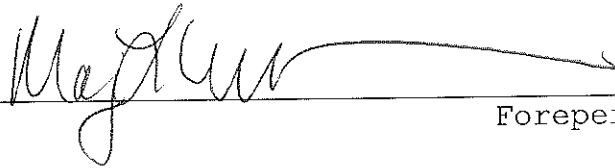
22 Cr. ____ ()

(Title 18, United States Code,
Sections 1343 and 2; Title 15, United
States Code, Section 645(a)).

DAMIAN WILLIAMS

United States Attorney

A TRUE BILL



Foreperson.
